

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Israel A. Schwartz, Esq.
O'HANLON SCHWARTZ, P.C.
511 Market Street
Camden, NJ 08102
Telephone: (267) 546-9066
– and –
Moshie Solomon, Esq.
LAW OFFICES OF MOSHIE SOLOMON, P.C.
Two University Plaza, Suite 100
Hackensack, New Jersey 07601
Telephone: (201) 705-1470

In Re:

MARIAH D. HERNANDEZ,

Debtor.

Case No.: 24-14880

Chapter: 13

Hearing Date: March 12, 2025

Judge: ABA

**JOINDER TO CHAPTER 13 TRUSTEE'S MOTION TO DISMISS CASE
AND REQUEST FOR RELATED RELIEF**

Goldcrest Properties a/k/a Jay Maple Apartments a/k/a Greenwood Maple Jay, landlord and creditor (the "Landlord") for Mariah D. Hernandez, the debtor (the "Debtor") in the captioned case, by and through its undersigned co-counsel, hereby joins in the Chapter 13 Trustee's oral motion, which was made on February 26, 2025 during the hearing for confirmation on the Debtor's Chapter 13 plan (the "Confirmation Hearing"), to dismiss this case (the "Dismissal Motion") in accordance with 11 U.S.C. § 1307.

For the reasons stated by the Chapter 13 Trustee at the Confirmation Hearing, and as further set forth in the attached Certification of Landlord in Support of Joinder to Chapter 13 Trustee's Motion To Dismiss Case, the Landlord joins the Dismissal Motion of the Chapter 13 Trustee and requests entry of an Order dismissing this Chapter 13 case, and further requests that

the Court (i) bar the Debtor from filing for bankruptcy protection, under any chapter, for a period of 180 days from the date of dismissal, and (ii) permanently terminate the stay so that if the Debtor does file another bankruptcy case, the stay will not go into effect with respect to the premises located at 1047 East Park Avenue, Unit E5, Vineland, NJ 08360 (the “Premises”).

WHEREFORE, for all the reasons set forth by the Chapter 13 Trustee at the Confirmation Hearing, and the attached Certification, the Landlord respectfully requests that this Court enter an Order (i) dismissing this Chapter 13 case, (ii) barring the Debtor from filing for bankruptcy protection, under any chapter, for a period of 180 days from the date of dismissal, and (iii) permanently terminating the stay so that if the Debtor does file another bankruptcy case, the stay will not go into effect with respect to the Premises.

Dated: Camden, New Jersey
March 3, 2025

O’HANLON SCHWARTZ, P.C.

/s/ Israel A. Schwartz
Israel A. Schwartz, Esq.
511 Market Street
Camden, NJ 08102
Telephone: (267) 546-9066

-and-

Dated: Hackensack, New Jersey
March 3, 2025

LAW OFFICES OF MOSHIE SOLOMON, P.C.

/s/ Moshie Solomon
Moshie Solomon, Esq.
Two University Plaza, Suite 100
Hackensack, New Jersey 07601
Telephone: (201) 705-1470

*Co-Counsel to Creditor Landlord Goldcrest
Properties a/k/a Jay Maple Apartments a/k/a
Greenwood Maple Jay*